



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
NEW YORK REGIONAL OFFICE
BROOKFIELD PLACE
200 VESEY STREET, ROOM 400
NEW YORK, NY 10281-1022

February 12, 2020

By Email and Fax

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: SEC v. Telegram Group Inc. & TON Issuer Inc., No. 19 Civ. 9439 (PKC)

Dear Judge Castel:

Plaintiff Securities and Exchange Commission (the “SEC”) respectfully submits this letter to request a one-day extension of its time to respond to the motions by Defendants Telegram Group Inc. and TON Issuer Inc. (collectively “Telegram”) and nine third parties to seal or redact portions of exhibits or filings that have been submitted in connection with the parties’ pending motions.

On February 7, 2020, the SEC filed a motion on consent, Dkt. 178, seeking permission to file an omnibus response to the various sealing motions and proposed that its response be due by February 12, 2020. The Court granted the SEC’s motion, Dkt. 179. The pending sealing motions concern over two hundred documents, with the parties and various third parties proposing alternative redactions to many of these documents. The process of identifying and responding in an organized, efficient manner to these multiple versions of proposed redactions has proven to be more time-consuming than originally anticipated.

Accordingly, the SEC respectfully requests a one-day extension, to February 13, 2020, of its time to respond to the sealing motions. Counsel for Telegram consents to this application.¹

Respectfully submitted,

/s/ Kevin P. McGrath
Kevin P. McGrath

¹ The SEC and Telegram will work with the third parties who have filed sealing motions to propose a briefing schedule, subject to the Court’s approval, for any responses to the SEC’s filing.

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cc: Alexander Drylewski, Esq.
Counsel for Defendants